

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Pamella Denise Taylor,)	Civil Action No.
)	
Plaintiffs,)	
)	
vs.)	<u>CREDIT ACCEPTANCE CORP.'S</u>
)	<u>RESPONSES TO LOCAL CIVIL RULE</u>
JD Motors, LLC and Credit Acceptance)	<u>26.01 (DSC) INTERROGATORIES</u>
Corp.,)	
)	
Defendants.)	
)	

Pursuant to Local Rule 26.01 (DSC), Defendant Credit Acceptance Corp. ("Credit Acceptance") hereby responds to the Court's interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Response: Credit Acceptance is unaware of any persons and/or legal entities that may have a subrogation interest in Plaintiff's claims. If Credit Acceptance becomes aware of such person(s) or legal entities, it will supplement its response.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.**

Response: Nonjury because Plaintiff's claims are subject to a binding arbitration and jury trial waiver agreement.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent and; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.**

Response: Credit Acceptance is a publicly owned corporation. It does not have any parent companies and no publicly-held corporation owns ten percent or more

of its stock. Credit Acceptance is not the parent of, and does not own ten percent or more of, any publicly-owned companies.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.**

Response: The case was removed from the Court of Common Pleas for Greenville County. 28 U.S.C. § 121.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

Response: Credit Acceptance is unaware of any related action filed in this District. If Credit Acceptance becomes aware of any such action, it will supplement this response.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

Response: Credit Acceptance was properly identified.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Response: Plaintiff's Complaint alleges that Defendant JD Motors, LLC is liable to Plaintiff for the allegations of the Complaint and that Credit Acceptance's exposure is limited to assignee liability. Credit Acceptance reserves all claims and defenses available to it as an assignee. Because this case is only in its initial stages, Credit Acceptance reserves the right to supplement this response later, if necessary.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Brian M. Barnwell

A. Mattison Bogan

SC Bar No. 72629

E-Mail: matt.bogan@nelsonmullins.com

Brian M. Barnwell

SC Bar No. 78249

E-Mail: brian.barnwell@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Attorneys for Credit Acceptance Corporation

Columbia, South Carolina

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